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ATTORNEYS FOR EXPRESS MOBILE, INC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

EXPRESS MOBILE, INC,

Plaintiff,

v.

SAP SE, SAP AMERICA, INC.,
and SAP LABS, LLC,

Defendants.

Case No. 3:20-cv-08492-RS

**PLAINTIFF’S NOTICE OF
SUPPLEMENTAL FACTS
REGARDING DEFENDANTS’
JOINER IN MASTER STAY
MOTION, WITH ADDITIONAL
ARGUMENT**

Express Mobile submits this Notice of Supplemental Facts Regarding Defendants SAP SE's, SAP America, Inc.'s, and SAP Labs, LLC's Joinder in Master Stay Motion, with Additional Argument, which is currently pending before the Court and set for oral argument on June 23, 2022. On May 26, 2022, the Patent Trials and Appeal Board terminated IPR Nos. IPR2022-00247, IPR2022-00248, and IPR2022-00249 prior to institution of any of the IPRs. These IPRs were filed by Booking Holdings, challenging certain claims from the '044, '287, and '755 patents, respectively.

As a result of this development, only the IPRs filed by Meta (fka Facebook, Inc.) against these patents are proceeding, and the parties and the Court thus now have certainty as to which of the asserted claims in this case are no longer subject to any IPR challenges. For the Court's convenience, the updated status of the asserted claims from these patents versus the claims subject to IPRs is below. To be clear, there are no additional IPRs for any of the asserted patents awaiting institution decisions.

Table of Asserted Claims (bold indicates independent claims):

Patent	Claims not subject to IPR	Claims subject to IPR
'044	3, 13, 15 , 17, 19, 20, 21, 24, 25, 26, 27	1 , 5, 6, 7, 11, 12
'287	3, 13, 15 , 17, 19, 20, 21, 24, 25, 26, 27	1 , 5, 6, 7, 11, 12
'755	3, 12 , 14, 16, 17, 18, 21, 22	1 , 5, 6, 7

1 DATED: June 2, 2022

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